


Hon. Kandis A. Westmore
United States District Court for the Northern District of California
Oakland Courthouse
1301 Clay Street
Oakland, California 94612

FILED
MAY 18 2020 
SUSAN T. SUGG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA
OAKLAND OFFICE

Re: *United States v. One Parcel of Real Property Located at 9414 Plaza Point Drive,
Missouri City, Texas, 77459*, No. 20-cv-02013-KAW (N.D. Cal.)

Dear Judge Westmore:

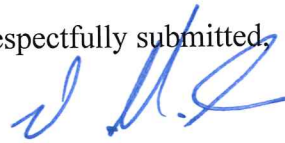
I am writing to explain why the claim I filed for ownership of the defendant parcel of real property in the above captioned civil forfeiture *in rem* case was timely filed before the May 8, 2020 deadline.

Following the instructions in the Handbook for Pro Se Litigants for the United States District Court for the Northern District of California, I filed the claim on May 5, 2020, by mailing 3 copies via UPS to the Oakland Courthouse Clerk's Office, and mailing a copy for service to Plaintiff's counsel Assistant U.S. Attorney Chris Kaltsas. Because I live in Texas, I could not file the claim at the Oakland courthouse without great expense and inconvenience, and fear of exposure to the COVID-19 virus. (I am the sole breadwinner for my family and cannot run the risk of getting infected.) The pro se handbook stated that I could not e-file documents until after I had appeared in the case and filed a motion with the court for permission to e-file. Thus, the only way I could file the claim was by mail. I did already mail the Clerk's Office the required paperwork in order to e-file.

However, due to the coronavirus pandemic, the Clerk's Office was not open every day the week of May 4. Thus, when UPS attempted to deliver the claim on Wednesday, May 6, and again on Friday, May 8, the claim could not be delivered because the Clerk's Office was closed. I have enclosed with this letter as Exhibit A a copy of UPS's tracking information for the envelope containing the claim, showing that UPS unsuccessfully attempted to deliver the envelope on May 6 and May 8, and did not successfully deliver the envelope until May 12, 2020. I have also enclosed with this letter as Exhibit B a copy of UPS's tracking information for the envelope containing the claim sent to Plaintiff's counsel, which was successfully delivered on May 6, 2020.

I made sure to mail the claim to the courthouse overnight on May 5, 2020, to ensure that I would not lose my house due to any technical failure. It is not my fault that the Clerk's office was not open on May 6 or May 8 to receive and accept for filing my claim for the property. I therefore respectfully request that the Court accept my claim as having been timely filed on May 6, 2020, when UPS first attempted to deliver it to the Oakland courthouse.

Respectfully submitted,



Rowland Marcus Andrade

5-15-20

cc: Chris Kaltsas, Assistant United States Attorney

Enclosures

Exhibit A

5/15/2020

Tracking | UPS - United States



Tracking Details

1ZW1451V1313194319

Updated: 05/15/2020 5:10 P.M. EST

Delivered

Delivered On

Tuesday
05/12/2020

Delivery Time

at 10:05 A.M.

Send Updates

Delivered To

OAKLAND, CA, US

Left At: Receiver

Received By:

Proof of Delivery.

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We do this to better understand how visitors use our site and to offer you a more personal experience. Please see our [Privacy Policy](#) for more information. We care about the security of your package. Log in () to get more details about your delivery.

Shipment Progress ^

Overview

Detailed View

		Date	Location	Activity
⬇	Delivered	05/12/2020 10:05 A.M.	OAKLAND, CA, US	DELIVERED <u>Proof of Delivery</u>
⬇	Out for Delivery	05/12/2020 9:42 A.M.	Oakland, CA, United States	Out For Delivery Today
		05/12/2020 5:34 A.M.	Oakland, CA, United States	Destination Scan
		05/12/2020 4:45 A.M.	Oakland, CA, United States	Destination Scan
		05/11/2020 8:53 A.M.	Oakland, CA, United States	Destination Scan
⬇	Delivery Attempted	05/08/2020 2:17 P.M.	Oakland, CA, United States	The receiving business was closed at the time of the second delivery attempt. A final attempt will be made.
		05/08/2020 9:38 A.M.	Oakland, CA, United States	Out For Delivery Today
		05/08/2020 5:01 A.M.	Oakland, CA, United States	Destination Scan
		05/07/2020 9:21 A.M.	Oakland, CA, United States	Destination Scan

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5/15/2020

Tracking | UPS - United States

	Date	Location	Activity
	05/06/2020 10:26 A.M.	Oakland, CA, United States	The receiving business was closed at the time of the first delivery attempt. A second attempt will be made.
	05/06/2020 9:32 A.M.	Oakland, CA, United States	Out For Delivery Today
	05/06/2020 7:09 A.M.	Oakland, CA, United States	Destination Scan
	05/06/2020 6:55 A.M.	Oakland, CA, United States	Arrival Scan
	05/06/2020 6:45 A.M.	Oakland, CA, United States	Departure Scan
	05/06/2020 5:17 A.M.	Oakland, CA, United States	Arrival Scan
	05/06/2020 3:44 A.M.	Louisville, KY, United States	Departure Scan
	05/06/2020 1:01 A.M.	Louisville, KY, United States	Arrival Scan
	05/05/2020 10:09 P.M.	Houston, TX, United States	Departure Scan
	05/05/2020 9:25 P.M.	Houston, TX, United States	Arrival Scan
	05/05/2020 8:36 P.M.	Stafford, TX, United States	Departure Scan
Shipped	05/05/2020 8:06 P.M.	Stafford, TX, United States	Origin Scan

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5/15/2020

Tracking | UPS - United States

		Date	Location	Activity
⏴	Label Created	05/05/2020 7:08 P.M.	United States	Order Processed: Ready for UPS

Shipment Details

Service

UPS Next Day Air Saver® [\[?\]](https://www.ups.com/content/us/en/shipping/time/service/next_day_saver.html)
(https://www.ups.com/content/us/en/shipping/time/service/next_day_saver.html)

Weight

0.20 LBS

Shipped / Billed On

05/05/2020

Shipment Category

Package

[Show Less](#) —

Track

[Help](#) [?]

Track

Thank you,
UPS My Choice Premium
members!

Not a Premium Member?
Upgrade your delivery experience
\$5 Off with code C1PG6FYS6

UPS MyChoice®
Premium

[FIND OUT MORE](#)

(https://wwwapps.ups.com/ppc/ppc.html/preferencePage/mychoicePreference/membership?loc=en_US)

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5/15/2020

Tracking | UPS - United States

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Exhibit B

5/15/2020

Tracking | UPS - United States



Tracking Details

1ZW1451V1379861073

Updated: 05/15/2020 5:23 P.M. EST

Delivered



Delivered On

Wednesday
05/06/2020

Delivery Time

at 10:33 A.M.

Send Updates

Delivered To

SAN FRANCISCO, CA, US

Left At: Front Desk

Received By:

Proof of Delivery

We care about the security of your package. [Log in\(\)](#) to get more details about your delivery.

Shipment Progress ^

Overview

Detailed View

		Date	Location	Activity
⬇	Delivered	05/06/2020 10:33 A.M.	SAN FRANCISCO, CA, US	DELIVERED <u>Proof of Delivery</u>
⬇	Out for Delivery	05/06/2020 9:08 A.M.	San Francisco, CA, United States	Loaded on Delivery Vehicle
		05/06/2020 8:45 A.M.	San Francisco, CA, United States	Out For Delivery Today
		05/06/2020 7:26 A.M.	San Francisco, CA, United States	Destination Scan
		05/06/2020 6:05 A.M.	Oakland, CA, United States	Departure Scan
		05/06/2020 5:17 A.M.	Oakland, CA, United States	Arrival Scan
		05/06/2020 3:44 A.M.	Louisville, KY, United States	Departure Scan
		05/06/2020 1:01 A.M.	Louisville, KY, United States	Arrival Scan
		05/05/2020 10:09 P.M.	Houston, TX, United States	Departure Scan
		05/05/2020 9:25 P.M.	Houston, TX, United States	Arrival Scan
		05/05/2020 8:36 P.M.	Stafford, TX, United States	Departure Scan

5/15/2020

Tracking | UPS - United States

		Date	Location	Activity
⬇	Shipped	05/05/2020 8:05 P.M.	Stafford, TX, United States	Origin Scan
⬆	Label Created	05/05/2020 7:08 P.M.	United States	Order Processed: Ready for UPS

Shipment Details



Service

UPS Next Day Air Saver® [🔗](https://www.ups.com/content/us/en/shipping/time/service/next_day_saver.html)
(https://www.ups.com/content/us/en/shipping/time/service/next_day_saver.html)

Weight

0.20 LBS

[Show More](#) +

 Track

[Help](#) 

Track

Thank you,
UPS MyChoice Premium
members!

Not a Premium Member?
Upgrade your delivery experience
\$5 Off with code C1PG6FYS6

UPS MyChoice®
Premium

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(https://wwwapps.ups.com/ppc/ppc.html/preferencePage/mychoicePreference/membership?loc=en_US)